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May 6, 2024

Via CM/ECF and U.S. Mail

Hon. John G. Koeltl
United States District Court Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Dear Judge Koeltl:

Re: *Ramon Dejesus Cedeno, Individually and on behalf of a class of all other persons similarly situated v Argent Trust Company, et al.*
Case No. 20-cv-09987

*This action is stayed
until notice to the
Court by one of the parties
that the stay issued in
the W.D.N.Y. is lifted -
so ordered. J.G. Koeltl U.S.D. J.
5/7/24*

On January 11, 2024, the U.S. District Court for the Western District of New York (the "Court") issued an Ex Parte Temporary Restraining Order with an Asset Freeze, Appointment of Receiver, and Other Equitable Relief in *Consumer Financial Protection Bureau, et al. v. StratFS, LLC, et al.* (W.D.N.Y.), Case No. 1:24-cv-00040-EAW-MJR (the "CFPB Action"). I am counsel to Thomas W. McNamara, who was appointed temporary receiver of the Receivership Defendants in the CFPB action,¹ which includes, among other entities, Strat FS, LLC (f/k/a Strategic Financial Solutions, LLC), Duke Enterprises, LLC, Blaise Investments, LLC and Twist

¹ "Receivership Defendants" is defined to mean Stratfs, LLC (f/k/a Strategic Financial Solutions, LLC), Strategic Client Support, LLC (f/k/a Pioneer Client Services, LLC), Strategic CS, LLC, Strategic FS Buffalo LLC, Strategic NYC, LLC, BCF Capital, LLC, T Fin, LLC, Strategic Consulting, LLC, Versara Lending, LLC, Strategic Family, Inc., Anchor Client Services, LLC (Now Known as CS 1 PAAS Services, LLC), Bedrock Client Services, LLC, Boulder Client Services, LLC, Canyon Client Services, LLC, Carolina Client Services, LLC, Great Lakes Client Services, LLC, Guidestone Client Services, LLC, Harbor Client Services, LLC, Heartland Client Services, LLC, Monarch Client Services, LLC (Now Known as CS 2 PAAS Services, LLC), Newport Client Services, LLC, Northstar Client Services, LLC, Option 1 Client Services, LLC, Pioneer Client Servicing, LLC, Rockwell Client Services, LLC, Royal Client Services, LLC, Stonepoint Client Services, LLC, Summit Client Services, LLC (Now Known as CS 3 PAAS Services, LLC), Whitestone Client Services, LLC. The individual defendants are Ryan Sasson, Jason Blust. Relief Defendants Strategic ESOP, Strategic ESOT, Twist Financial, LLC, Duke Enterprises, LLC, Blaise Investments, LLC, The Blust Family Irrevocable Trust through Donald J. Holmgren, Trustee, Lit Def Strategies, LLC, and Relialit, LLC

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Financial, LLC. On March 4, 2024, the Court entered a Preliminary Injunction ("PI") confirming the Receiver's appointment. A copy of the PI is attached.

The pending litigation was recently brought to my attention by counsel for the defendants. The Court has imposed a stay of actions during the pendency of the receivership. The PI provides:

Except by leave of this Court, during pendency of the Receivership ordered herein, all Receivership Defendants and all other Persons and entities are hereby stayed from taking any action to establish or enforce any claim, right, or interest for, against, on behalf of, in, or in the name of, the Receivership Defendants, any of their subsidiaries, affiliates, partnerships, Assets, Documents, or the Receiver..., including, but not limited to, the following actions:

1. Commencing, prosecuting, continuing, entering, or enforcing any suit or proceeding, except that such actions may be filed to toll any applicable statute of limitations;...

See PI, Section XX, A., pg. 32. Without leave of the Western District of New York, this action is presently subject to a stay imposed by the PI.

If you have any questions, please contact me at (716) 848-1361.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'JCT' or similar, written over a horizontal line.

James C. Thoman

cc: Thomas W. McNamara, Esq. (via email w/encl.)

JCT:mah
Enclosure